

**MODULE V - CORRECTIVE ACTION FOR  
SOLID WASTE MANAGEMENT UNITS  
AND SCHEDULE OF COMPLIANCE**

**V.A RCRA FACILITY ASSESSMENT**

- V.A.1 The RCRA Facility Assessment (RFA) has been completed for this facility. The final RFA report was completed on March 3, 1989. The revised Solid Waste Management Units (SWMUs) list with Identification Number, Description of Units and allocation of responsibility is contained in Attachment 1.

**V.B RCRA FACILITY INVESTIGATION**

- V.B.1 RCRA Facility Investigations (RFI) have been conducted in accordance with approved work plans to determine the nature and extent of known and suspected releases of hazardous wastes or hazardous waste constituents from each SWMU at the facility. Reports submitted to date include the following:
- V.B.1.a Task I, Description of Current Activities (approved March 5, 1992)
  - V.B.1.b Task II, RFI Work Plan (approved March 31, 1992)
  - V.B.1.c Task III, RFI Reports, including:
    - V.B.1.c.i Part 1, Investigation of Environmental Setting (approved April 23, 1993).
    - V.B.1.c.ii Part 2, Characterization of Potential Sources of Contamination and Prioritization of SWMUs (approved July 13, 1993).
    - V.B.1.c.iii Part 3, Identification and Description of Potential Receptors (approved February 25, 1993)
    - V.B.1.c.iv Part 4, Characterization of Existing Contamination - Screening Investigation Report (SI Report) approved March 13, 1996.
    - V.B.1.c.v Part 4, Verification Investigation Work Plan approved October 13, 2000 (VIWP).
  - V.B.2 The RFI has identified SWMUs that require additional investigation in accordance with the VIWP.
  - V.B.3 Three general SWMU categories have been identified as a result of the SI Report of the

RFI. These SWMUs will be investigated in accordance with the VIWP.

- V.B.3.a **Category A SWMUs.** These are SWMUs that appear to be candidates for No Further Action (NFA).
- V.B.3.b **Category B SWMUs.** These are SWMUs that appear to require minimal remediation to qualify as candidates for NFA.
- V.B.3.c **Category C SWMUs.** These are SWMUs that require additional data to characterize and appropriately categorize each SWMU or that require additional investigation to support a site specific risk evaluation or engineered remediation.

**V.C INTERIM MEASURES**

- V.C.1 If, during the course of any activity initiated in compliance with the conditions of this Permit the responsible Permittee(s) as defined in Attachment 1, the Permittee or the Executive Secretary determines that a release or potential release of hazardous waste or hazardous waste constituents from a SWMU poses a threat to human health and the environment, the responsible Permittee(s) may request or the Executive Secretary may specify interim measures.
- V.C.2 The Executive Secretary shall notify the responsible Permittee(s) in writing of the requirement to perform the interim measures.
- V.C.3 Within 30 calendar days of receiving the written notification requiring the Interim Measures as specified in Permit Condition V.C.2., the responsible Permittee(s) shall submit an Interim Measures Plan for approval.
- V.C.4 The Interim Measures Plan shall specify action(s) that shall be taken to implement the interim measure, including potential permit modifications and the schedule for implementing the required measures. The Interim Measures Plan shall include the following:
  - V.C.4.a Time required to develop and implement a final remedy;
  - V.C.4.b Actual and potential exposure of human and environmental receptors;
  - V.C.4.c Actual and potential contamination of drinking water supplies and sensitive ecosystems;
  - V.C.4.d The potential for further degradation of the medium absent interim measures;

- V.C.4.e Presence of hazardous waste in containers that may pose a threat of release;
- V.C.4.f Presence and concentration of hazardous waste including hazardous waste constituents in soils that have the potential to migrate to groundwater or surface water;
- V.C.4.g Weather conditions that may affect the current levels of contamination;
- V.C.4.h Risks of fire, explosion, or accident; and
- V.C.4.i Other situations that may pose threats to human health and the environment.
- V.C.5 The Interim Measures Plan shall be incorporated into this Permit in accordance with Condition I.N.5.

**V.D NOTIFICATION REQUIREMENTS FOR AND ASSESSMENT OF PREVIOUSLY UNIDENTIFIED SOLID WASTE MANAGEMENT UNITS**

- V.D.1 When the Permittee discovers any SWMU not previously identified in the Permit, the Permittee shall notify the Executive Secretary within 30 calendar days of discovering the SWMU(s). The notification shall include the location of the new SWMU(s) and information on the suspected or known wastes at the site, and identify the responsible Permittee for the new SWMU in Attachment 1.
- V.D.2 Within 90 calendar days following discovery of the SWMU(s), the Responsible Permittee shall submit a SWMU Assessment Plan to the Executive Secretary.
- V.D.3 The SWMU Assessment Plan shall include the following:
  - V.D.3.a The identification number for the new SWMU(s) and information concerning past and present operations at the SWMU(s); and
  - V.D.3.b Any groundwater, surface water, soil (surface or subsurface strata), or air sampling and analysis data needed to determine whether a release of hazardous waste or hazardous waste constituents from the SWMU(s) is likely to occur. The SWMU Assessment Plan shall demonstrate that the sampling and analysis program, if applicable, is capable of yielding representative samples and must include parameters sufficient to identify migration of hazardous waste and hazardous constituents from the newly discovered SWMUs to the environment.
- V.D.4 The Executive Secretary shall approve the SWMU Assessment Plan or shall notify

- the Responsible Permittee of the SWMU Assessment Plan's deficiencies and specify a due date for submittal of a revised Plan.
- V.D.5 The SWMU Assessment Plan shall be incorporated into this Permit in accordance with Condition I.N.5.
- V.D.6 The Responsible Permittee shall implement the approved SWMU Assessment Plan within 30 days of approval.
- V.D.7 The SWMU Assessment Plan shall contain a schedule, including the submission date for a SWMU Assessment Report.
- V.D.8 The SWMU Assessment Report shall describe all results obtained from the implementation of the approved SWMU Assessment Plan. At a minimum, the Report shall provide the following information for each previously unidentified SWMU:
- V.D.8.a The SWMU location, identified on a map;
- V.D.8.b The type and function of the SWMU, including general dimensions and a structural description;
- V.D.8.c The period during which the SWMU was operated; and
- V.D.8.d All wastes that were or are being managed at the SWMU including results of any sampling and analysis used to determine whether releases of hazardous wastes or hazardous waste constituents have occurred, are occurring, or are likely to occur from the SWMU.
- V.D.9 Based on the results of SWMU Assessment Report, the Executive Secretary shall determine the need for further investigations at specific SWMUs included in the SWMU Assessment Report. If the Executive Secretary determines that such investigations are needed, the Executive Secretary may require the Responsible Permittee to prepare a plan for such investigations in accordance with the VIWP. The Executive Secretary shall review the plan and either approve it or notify the Responsible Permittee of its deficiencies.
- V.D.10 The Responsible Permittee shall notify the Executive Secretary of any release(s) of hazardous waste or hazardous waste constituents discovered during the course of groundwater monitoring, field investigation, environmental auditing, or other activities undertaken during the RFI. The written notification shall be received by the Executive Secretary no later than 15 working days after discovery. Such releases may be from already documented or previously unidentified SWMUs. The Executive

Secretary may require a plan for further investigation of the new release(s). The Executive Secretary shall review the plan and either approve it or notify the Responsible Permittee of its deficiencies.

**V.E      DETERMINATION OF NO FURTHER ACTION**

- V.E.1      If, upon investigation of any SWMU, the Responsible Permittee determines that corrective action would not be necessary, in accordance with the VIWP, the Responsible Permittee may petition the Executive Secretary in writing for a determination that no further action is necessary. The Executive Secretary shall either approve or disapprove the petition in writing.
- V.E.2      A determination of no further action shall not preclude the Executive Secretary from requiring further investigations, or remediation at a later date, if new information or subsequent analysis indicates that a release or likelihood of a release from a SWMU at the facility is likely to pose a threat to human health or the environment. In such a case, the Executive Secretary shall initiate major permit modification in accordance with R315-3-4.3 or rescind the determination made in accordance with Condition V.E.1.

**V.F      CORRECTIVE ACTION PLAN**

- V.F.1      The VIWP, provides the bases for implementation of corrective action at SWMUs. As described in the VIWP such corrective action may include investigation, remediation, or both.
- V.F.2      Investigation and remediation plans, including sampling plans required by the VIWP shall be submitted to the Executive Secretary for approval prior to implementation with schedules for implementation.
- V.F.3      Within 60 days of completion of investigations or remediation required by Condition V.F.2, the Responsible Permittee shall submit, for approval, reports which summarize final sampling activities, investigative results, risk evaluation results, further corrective action to be implemented, and a schedule for further corrective action implementation.

**V.G      CORRECTIVE ACTION IMPLEMENTATION**

- V.G.1      The responsible Permittee(s) shall implement Corrective Action Plans (CAP) in

accordance with the schedule approved in each VIWP Report as described in Conditions V.F.2 and V.F.3. Work will commence in accordance with the schedule for corrective action implementation described in Conditions V.F.2. and V.F.3.

- V.G.2 On November 13, 2000, USS and Geneva Steel submitted applications for three Corrective Action Management Units (hereinafter “CAMUs”). By letter dated November 17, 2000, the Executive Secretary accepted that application as substantially complete. Use of these CAMUs is integral to performance of work required by this Permit. Consequently, USS and Geneva Steel shall submit to the Executive Secretary CAMU designs and CAMU operation and maintenance plans. Upon approval by the Executive Secretary, the designs and plans will be incorporated in this Permit. The CAMUs shall be constructed, operated, and maintained in accordance with the approved design and plans.
- V.G.3 Perimeter groundwater monitoring, additional groundwater investigations, and the Tier 2 Ecological Risk Assessment described in the VIWP will be performed in accordance with Table 1 of Module V.

**V.H REPORTING REQUIREMENTS**

- V.H.1 USS and Geneva Steel shall submit to the Executive Secretary signed semi-annual progress reports of all activities for which each is responsible, either individually or collectively, (e.g., Interim Measures, RFI, Corrective Action) conducted pursuant to the Permit conditions of Module V.
- V.H.2 The progress reports shall contain the following:
- V.H.2.a A description of the work completed;
  - V.H.2.b Summaries of all findings and all raw data;
  - V.H.2.c Summaries of all problems or potential problems encountered during the reporting period and actions taken or to be taken to rectify problems; and
  - V.H.2.d Projected work for the next reporting period including a list of SWMUs for which Notification Letters will be submitted.
- V.H.3 The responsible Permittee(s) shall maintain copies of all required reports, drilling logs, etc. at Geneva Steel, during the effective period of this Permit.
- V.H.4 The Executive Secretary may require the responsible Permittee(s) to conduct new or

more extensive assessments, investigations, or studies, as needed, based on information provided in these progress reports or other supporting information.

**V.I      FINANCIAL ASSURANCE FOR CORRECTIVE ACTION**


V.I.1      The Permittee shall be financially responsible for completing facility-wide corrective  
on.

Table 1 Module V

Corrective Action Compliance Schedule

| <u>Activity</u>  | <u>Due Date</u>  |
|--|--|
| Permittee submits report on Semi-Annual (first year only) Perimeter Groundwater Monitoring event in accordance with approved VIWP  | July 15, 200X and January 15, 200Y   |
| Permittee submits report on Annual (second year and thereafter) Perimeter Groundwater Monitoring event in accordance with approved VIWP  | 90 days after sampling event   |
| Permittee submits report on semi-annual Post-Closure Groundwater Monitoring event at the Impoundments  | 90 days after sampling event   |
| Permittee submits progress reports on Corrective Action and Impoundment activities   | Semi-annually (every 180 calendar days), on the 15 <sup>th</sup> day of the month following the end of each semi-annual period |
| Permittee submits Annual SWMU corrective action forecast (list of SWMUs to be addressed) for upcoming year   | Include forecast in Second Semi-Annual Progress Report every year  |
| VIWP Investigation Reports.  | 60 Days of completion of investigations.   |
| Permittee submits Statistical Analysis Methodology for Facility –wide Perimeter Groundwater monitoring well network data   | 180 days after issuance of Permit  |
| Permittee submits plan for additional groundwater investigation and corrective action, including downgradient perimeter groundwater monitoring frequency and parameters, at Oil Reclamation Area | 60 days after issuance of Permit   |



Permittee submits plan for additional groundwater investigation, including "sentry wells," for remainder of facility

120 days after issuance of Permit

Permittee submits Tier 2 Ecological Risk Assessment (ERA) methodology

90 days after issuance of Permit

Permittee shall implement the Tier 2 ERA

60 days after Executive Secretary approval of ERA methodology, weather permitting